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April 24, 2023

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BY ECF

The Honorable Valerie E. Caproni
United States District Court
Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square
New York, NY 10007

Re: *Reclaim the Records and Alec Ferretti v. United States Department of State, No. 23 Civ. 1529 (VEC)*

Dear Judge Caproni:

My firm represents the Plaintiffs in the above-reference action brought pursuant to the Freedom of Information Act ("FOIA"). The parties write respectfully to jointly request a sixty-day extension of time for both the Initial Pretrial Conference ("IPTC") in this matter, currently scheduled for April 28, 2023, and for the parties to submit a pre-IPTC Joint Letter to the Court (until June 27, 2023 or later, with the pre-IPTC Joint Letter due a week prior).

This is the first request to reschedule the Initial Pretrial Conference in this matter. On April 14, 2023, the State Department requested, with Plaintiffs' consent, a sixty-day extension of time to respond to the complaint (from April 19 to June 19, 2023), as the government was in the process of evaluating whether there are any records responsive to Plaintiffs' FOIA request (Dkt. No. 11). The parties unintentionally failed to request to adjourn the Initial Pretrial Conference at that time. The Court granted the State Department's request on April 17, 2023 (Dkt. No. 12). Just this morning, the Department of State sent a response to Plaintiffs, stating that it located no responsive records subject to Plaintiffs' FOIA request. Plaintiffs are currently considering this response. Adjourning the Initial Pretrial Conference by sixty days would allow the parties to better understand and represent the prospects for settlement and any contemplated motions before appearing before Your Honor.

We thank the Court for its attention to this matter.

BELDOCK LEVINE & HOFFMAN LLP

The Honorable Valerie E. Caproni

April 24, 2023

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Respectfully,

A handwritten signature in black ink, appearing to read "Jeff Kinkle", written in a cursive style.

Jeffrey Kinkle